

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

- v. -

ANABEL COLON REYES,
a/k/a "Patricia Sanchez,"

Defendant.

**SEALED SUPERSEDING
INFORMATION**

S7 19 Cr. 536 (PKC)

COUNT ONE
(Narcotics Conspiracy)

The United States Attorney charges:

1. From at least in or about September 2018, up to and including at least in or about June 2019, in the Southern District of New York and elsewhere, ANABEL COLON REYES, a/k/a "Patricia Sanchez," the defendant, and others known and unknown, intentionally and knowingly did combine, conspire, confederate, and agree together and with each other to violate the narcotics laws of the United States.

2. It was a part and an object of the conspiracy that ANABEL COLON REYES, a/k/a "Patricia Sanchez," the defendant, and others known and unknown, would and did distribute and possess with intent to distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

3. The controlled substance that ANABEL COLON REYES, a/k/a "Patricia Sanchez," the defendant, conspired to distribute

and possess with intent to distribute was five kilograms and more of mixtures and substances containing a detectable amount of cocaine, in violation of Title 21, United States Code, Section 841(b)(1)(A).

(Title 21, United States Code, Section 846.)

COUNT TWO
(Conspiracy to Commit Money Laundering)

The United States Attorney further charges:

4. From at least in or about September 2018, up to and including at least in or about September 2019, in the Southern District of New York and elsewhere, ANABEL COLON REYES, a/k/a "Patricia Sanchez," the defendant, and others known and unknown, intentionally and knowingly did combine, conspire, confederate, and agree together and with each other to commit money laundering, in violation of Title 18, United States Code, Section 1956(a)(1)(A)(i).

5. It was a part and an object of the conspiracy that ANABEL COLON REYES, a/k/a "Patricia Sanchez," the defendant, and others known and unknown, in an offense involving and affecting interstate and foreign commerce, knowing that the property involved in certain financial transactions, to wit, cash transactions, represented the proceeds of some form of unlawful activity, would and did conduct and attempt to conduct such financial transactions, which in fact involved the proceeds of

specified unlawful activity, to wit, the narcotics offense charged in Count One of this Superseding Information, with the intent to promote the carrying on of the specified unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(1)(A)(i).

(Title 18, United States Code, Section 1956(h).)

FORFEITURE ALLEGATIONS

6. As a result of committing the controlled substance offense alleged in Count One of this Superseding Information, ANABEL COLON REYES, a/k/a "Patricia Sanchez," the defendant, shall forfeit to the United States, pursuant to Title 21, United States Code, Section 853, any and all property constituting, or derived from, any proceeds obtained, directly or indirectly, as a result of the offense and any and all property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, said offense, including but not limited to a sum of money in United States currency representing the amount of proceeds traceable to the commission of said offense.

7. As a result of committing the offense alleged in Count Two of this Superseding Information, ANABEL COLON REYES, a/k/a "Patricia Sanchez," the defendant, shall forfeit to the United States, pursuant to Title 18, United States Code, Section

982(a)(1), any and all property, real and personal, involved in said offense, or any property traceable to such property, including but not limited to a sum of money in United States currency representing the amount of property involved in said offense.

SUBSTITUTE ASSETS PROVISION


8. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:


- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third person;
- (c) has been placed beyond the jurisdiction of the Court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p) and Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property

of the defendant up to the value of the above forfeitable property.

(Title 18, United States Code, Section 982;
Title 21, United States Code, Section 853; and
Title 28, United States Code, Section 2461.)



AUDREY STRAUSS 
United States Attorney

Form No. USA-33s-274 (Ed. 9-25-58)

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(21 U.S.C. § 846;
18 U.S.C. § 1956(h).)

AUDREY STRAUSS
United States Attorney

Filed 6/14/2021



P. Kevin Castel
United States District Judge